

MEMORANDUM

DATE: December 1, 2006

TO: Rachel F. Potter
Office of Information and Regulatory Affairs
Office of Management and Budget

THROUGH: James Hyler
Regulatory Information Management Services
U.S. Department of Education

FROM: Thomas Kelley
Independent Living Unit Supervisor, RSA

SUBJECT: Request for Reinstatement of the State Plan for Independent Living (SPIL)

The purpose of this memorandum is to request the Office of Management and Budget (OMB)'s approval of the revised State Plan for Independent Living as a "reinstatement, with change, of a previously approved collection for which approval has expired." The previous SPIL expired in July 2004. It was not necessary to renew it prior to this year because the SPIL is a three-year data collection instrument with the next due date being July 1, 2007. The Rehabilitation Service Administration (RSA) hopes to obtain OMB's final approval by April 1, 2007.

States are required to submit an approvable SPIL in order to receive federal funding under the State Independent Living Services (SILS) and Centers for Independent Living (CIL) programs. These programs aim to maximize the leadership, empowerment, independence and productivity of individuals with significant disabilities and to promote their integration and full inclusion into the mainstream of American society. The SILS and CIL programs are authorized by chapter 1 of title VII of the Rehabilitation Act of 1973, as amended (PL 105-220). If the SPIL were not reinstated and the data collection not conducted, RSA would not be authorized to fund the IL programs and, as a result, the availability of independent living services in the states would be severely limited.

The revised SPIL has been streamlined to optimize the collection of useful information while minimizing the administrative burden for grantees. The revised SPIL eliminates or consolidates several sections from the previous SPIL, and requests only the information that federal law and regulations clearly require it to include. Moreover, it is more closely aligned to how RSA approaches its other programs that require State plans, including the State Vocational Rehabilitation Services and Supported Employment programs.

The revised SPIL incorporates input provided by the Council of State Administrators of Vocational Rehabilitation (CSAVR). The other major IL stakeholder group, the National Council on Independent Living (NCIL), opted not to provide comments prior to the SPIL's publication in the Federal Register.

In light of the foregoing, RSA respectfully requests that OMB approve the reinstatement of the revised SPIL. If you have any questions, do not hesitate to contact me at (202) 245-7404 or at thomas.kelley@ed.gov. Thank you for your consideration.